

**From:** [Aleksandra Mitchell](#)  
**To:** [Alisa Clowdus](#)  
**Subject:** FW: Your Clients: Joy White and Jordynn White; My Clients: Richard Diehl, Inc. and Steven Foulks; DOL: 06.21.23; claim No. AL170751 - Correspondence  
**Date:** Tuesday, August 1, 2023 9:57:58 AM

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Alisa,

My PDF printing is not working. Please save this email in PDF in Pleadings folder titled (Exhibit C – Correspondence between Counsel).

**ALEKSANDRA MITCHELL**

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**From:** Info Bethune Law Firm <info@bethunelawfirm.com>

**Sent:** Tuesday, August 1, 2023 8:41 AM

**To:** Shawn Kalfus <shawn.kalfus@stonekalfus.com>

**Cc:** Aleksandra Mitchell <alex.mitchell@stonekalfus.com>; Alisa Clowdus <alisa.clowdus@stonekalfus.com>; Sabrina Zellner <szellner@bethunelawfirm.com>

**Subject:** Re: Your Clients: Joy White and Jordynn White; My Clients: Richard Diehl, Inc. and Steven Foulks; DOL: 06.21.23; claim No. AL170751 - Correspondence

Shawn,

My client will **not** stipulate to capping her damages at \$75,000.00. Thanks.

Best regards,

Sabrina L. Zellner, Esq.

[www.BETHUNELAWFIRM.com](http://www.BETHUNELAWFIRM.com)

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On Mon, Jul 31, 2023 at 5:24 PM Shawn Kalfus <[shawn.kalfus@stonekalfus.com](mailto:shawn.kalfus@stonekalfus.com)> wrote:

Terrance, this case appears to be removable based on the diversity of citizenship of the parties and we plan to remove the case to federal court. However, if your client is willing to stipulate that she will not seek or accept in excess of \$75,000 in damages, exclusive of interest and costs, in this action or any subsequent action arising from the same accident, we will agree to keep the case in state court.

Please let me know as soon as possible. Otherwise, we will consider the non-response a refusal to stipulate and take steps to remove the case to federal court.

Thanks

Shawn

**SHAWN N. KALFUS**

**STONE KALFUS LLP**

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